

FILED
UNITED STATES DISTRICT COURT
ALBUQUERQUE, NEW MEXICO

JUL 12 2019

MITCHELL R. ELFERS
CLERK

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW MEXICO

UNITED STATES OF AMERICA,

Plaintiff,

vs.

TAVIS WASHBURN,

Defendant.

CRIMINAL NO. 19-2072MV

Count 1: 18 U.S.C. §§ 1153 and 1112:
Involuntary Manslaughter;

Count 2: 18 U.S.C. § 1153(b) and N.M.
STAT. ANN. § 30-6-1: Child Abuse.

INFORMATION

The United States Attorney charges:

Count 1

On or about February 15, 2018, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **TAVIS WASHBURN**, an Indian, unlawfully killed John Doe 1 while in the commission of an unlawful act not amounting to a felony, that is speeding and operating a motor vehicle while under the influence of alcohol.

In violation of 18 U.S.C. §§ 1153 and 1112.

Count 2

On or about February 15, 2018, in Indian Country, in San Juan County, in the District of New Mexico, the defendant, **TAVIS WASHBURN**, an Indian, and a parent, guardian and custodian of John Doe 2, negligently, recklessly, and without justifiable cause, operated a motor vehicle while under the influence of alcohol, causing John Doe 2, a child under the age of eighteen, to be placed in a situation that may have endangered the life and health of John Doe 2.

In violation of 18 U.S.C. § 1153(b) and N.M. STAT. ANN. § 30-6-1.

JOHN C. ANDERSON

United States Attorney

A handwritten signature in black ink, appearing to read "allison jaros", is positioned below the typed name.

ALLISON JAROS

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